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March 20, 2014

The Honorable Joseph F. Bianco
United States District Judge
Eastern District of New York
924 Federal Plaza
Central Islip, NY 11722

Re: *United States v. Joseph Valerio*
14-CR-094-JFB

Dear Judge Bianco:

The undersigned represent the defendant Joseph Valerio and write in support of Valerio's second bail application, which is scheduled for 1 p.m. on March 21, 2014. The Court should release Valerio on a \$3 million secured bond subject to a home confinement that will include, among other provisions, one security officer posted inside Valerio's house and a second security officer posted either inside the house or outside the house.

At the first bail application, Valerio proposed that his home detention would be enforced by, among other measures, the following:

- House arrest;
- GPS electronic monitoring;
- An outdoor video surveillance system to be accessed at will by the FBI;
- Only government-approved persons permitted to enter the house;
- Searches of all persons entering and leaving the house;
- Unannounced searches of the house and all persons in the house;
- A prohibition on possession of cell phones, computers and the like; and
- One security officer, from Manhattan-based Epic Security, posted outside the house.

In denying the bail application, the Court was unpersuaded that one security officer posted outside the house could enforce Valerio's activities inside the house. Valerio thus now proposes to supplement his proposal with the following: two security officers posted 24 hours a day, seven days a week, with one officer stationed inside the house and the other officer stationed either inside the house or outside in a car.

The government cannot show by clear and convincing evidence that the above measures would be inadequate to reasonably assure the safety of other persons and the community. The government also cannot show by a preponderance of the evidence that such measures would be inadequate to reasonably assure Valerio's appearance.

Respectfully,

Anthony M. La Pinta
Anthony M. La Pinta

Leonard Lato
Leonard Lato

cc: AUSA Allen Bode